

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JANE DOE 1 and JANE DOE 2, on behalf of  
themselves and all similarly situated women,

Plaintiffs,

-against-

THE CITY OF NEW YORK and BENNY  
SANTIAGO,

Defendants.

15 Civ. 3849 (AKH)

**NOTICE OF PLAINTIFFS' MOTION *IN LIMINE* TO DEEM  
CERTAIN FACTS ADMITTED**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and the Declaration of Josh E. Anderson, dated April 17, 2017, plaintiffs Jane Doe 1 and Jane Doe 2 ("Plaintiffs") hereby move this Court, at a date and time to be determined by the Court, for an order to deem certain facts admitted at trial; and

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's orders, opposition papers are due on April 24, 2017.

Plaintiffs submit the following exhibits to the Anderson Declaration:

Exhibit 1	Defendant City of New York's Responses & Objections to Plaintiffs' Requests for Admission, dated July 1, 2016
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Dated: New York, New York  
April 17, 2017

Respectfully submitted,

CLEARY GOTTlieb STEEN & HAMILTON LLP

/s/ James L. Bromley

By:

James L. Bromley  
*jbromley@cgsh.com*

One Liberty Plaza  
New York, New York 10006  
Tel: (212) 225-2000  
Fax: (212) 225-3999

Of Counsel:  
Mitchell A. Lowenthal  
*mlowenthal@cgsh.com*  
Josh E. Anderson  
*jeanderson@cgsh.com*

William D. Gibney  
*wdgibey@legal-aid.org*  
Marlen S. Bodden  
*mbodden@legal-aid.org*  
Barbara P. Hamilton  
*bphamilton@legal-aid.org*  
THE LEGAL AID SOCIETY  
199 Water Street, 6th Floor  
New York, New York 10038  
Tel: (212) 577-3300

*Attorneys for Plaintiffs*